NUCLEAR ENERGY INSTITUTE

Rod McCullum
DIRECTOR
FUEL CYCLE PROJECTS
NUCLEAR GENERATION DIVISION

September 10, 2010

Ms. Catherine Haney
Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Integrated Safety Analysis: Why It Is Appropriate for Fuel Recycling Facilities

Project Number: 689

Dear Ms. Haney:

Enclosed for your review is a Nuclear Energy Institute white paper on the use of Integrated Safety Analysis (ISA) at U.S. Nuclear Regulatory Commission-licensed recycling facilities. This paper is intended as an information source for the NRC and should serve as a foundation for discussion with industry representatives on the issue.

This paper concludes that an ISA is a risk-informed, performance-based way of achieving and maintaining safety at fuel recycling facilities. As outlined in the paper, an ISA can be rigorously developed and used to support a safety decision for these facilities. Using qualitative or semi-quantitative techniques, as established for ISAs, these facilities can achieve and demonstrate safety in an effective and efficient manner.

We believe that additional discussions between industry and the NRC can further advance the ongoing dialogue on the regulatory framework for recycling facilities that the NRC is in the process

1776 I Street, NW | Suite 400 | Washington, DC | 20006-3708 | P: 202.739.8082 | F: 202.533.0166 | rxm@nei.org | www.nei.org

of developing. NEI is prepared to meet with the NRC staff, at its earliest convenience, for the purpose of discussing this white paper. If you have any questions, please address them to me.

Sincerely,

Rod McCullum

Attachment

c: Ms. Marissa G. Bailey, Deputy Director NMSS/FSSS/SPTSD, NRC
Mr. Thomas G. Hiltz, NMSS/FCSS/SPTSD, NRC
NRC Document Control Desk